EXHIBIT 4 to DEFENDANT UNIONBANCAL CORPORATION'S MOTION FOR CLARIFICATION OR FOR A PROTECTIVE ORDER REGARDING DISCOVERY ORDER (D.E. NO. 597) AND ENLARGEMENT OF TIME

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UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

DATATREASURY CORPORATION Plaintiff, vs. WELLS FARGO & COMPANY et al. Defendants.	§ § § § § § § § § § § § § § §	Civil Action No. 2:06cv72

DEFENDANT UNIONBANCAL CORPORATION'S SUPPLEMENTAL OBJECTIONS AND RESPONSES TO PLAINTIFF'S FIRST SET OF INTERROGATORIES REGARDING JURISDICTIONAL DISCOVERY TO DEFENDANT UNIONBANCAL CORPORATION

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and Rule 26 of the Local Rules of the United States District Court for the Eastern District of Texas, Defendant UnionBanCal Corporation ("UBC") hereby submits this supplemental response and objections to Plaintiff DataTreasury Corporation's ("DTC") First Set of Interrogatories Regarding Jurisdictional Discovery.

GENERAL OBJECTIONS

UBC incorporates herein by reference all of the General Objections, Objections to Definitions, Objections to Instructions and Specific Objections included in Defendant UnionBanCal Corporations Objections and Responses To Plaintiff's First Set of Interrogatories

Regarding Jurisdictional Discovery To Defendant UnionBanCal Corporation, served on January 25, 2007.

OBJECTIONS AND RESPONSES

Investigation and discovery are ongoing in this case. UBC responds to these interrogatories based on a reasonable investigation of the facts as presently known and without prejudice to its right to supplement or modify its responses hereto. UBC also reserves the right to produce or use any information or document, the existence or relevance of which is discovered after the service of this response, in support of or in opposition to any motion, in any deposition or at trial.

INTERROGATORY NO. 15 [sic]:

Please identify all officers, directors, and employees of UnionBanCal Corporation that also serve as officers, directors, or employees of Union Bank of California, N.A.

OBJECTIONS AND SUPPLEMENTAL RESPONSE:

UBC objects to this interrogatory on the grounds set forth in the General Objections and incorporates those objections herein. UBC further objects to this interrogatory as overly broad, unduly burdensome, vague, and ambiguous to the extent that it seeks information that is not relevant to UBC's contacts with Texas or the establishment of personal jurisdiction over UBC and, therefore, is beyond the scope of jurisdictional discovery. Subject to and without waiver of the foregoing general and specific objections, UBC responds as follows:

All officers of UBC are also officers of Union Bank of California, N.A. All directors of UBC are also directors of Union Bank of California, N.A., except Messrs. Kanari and Miki. UBC has no employees. As of January 31, 2007, Union Bank of California, N.A. had 3,782 officers. Of those 3,782 officers, 46 are also officers of UnionBanCal Corporation, including:

Tetsuo Shimura	Chairman
Takashi Morimura	President and Chief Executive Officer
Philip B. Flynn	Vice Chair and Chief Operating Officer
David I. Matson	Vice Chair and Chief Financial Officer
Masashi Oka	Vice Chair, Administration and Support, and Insider Trading Compliance Officer
Linda F. Betzer	Executive Vice President, Operations and Customer Services Group
JoAnn M. Bourne	Executive Vice President, Commercial Deposit and Treasury Management Division
Bruce H. Cabral	Executive Vice President and Chief Credit Officer
John C. Erickson	Executive Vice President, Commercial Banking & Wealth Management Group
Paul E. Fearer	Executive Vice President and Director of Human Resources
Steven L. Glaser	Executive Vice President, Retail Banking Group
John H. McGuckin, Jr.	Executive Vice President, General Counsel, and Secretary
James Yee	Executive Vice President and Chief Information Officer
Johannes H. Worsoe	Executive Vice President, Global Markets Group
William J. Stolte	Executive Vice President, Independent Risk Monitoring Group
Grant K. Ahearn	Executive Vice President, Energy Capital Services
David A. Anderson	Executive Vice President and Controller
William G. Christensen	Executive Vice President
Paul E. Gaenger	Executive Vice President and Senior Credit Officer
Kimihisa Imada	Executive Vice President, Pacific Rim Corporate Group
J. Michael Stedman	Executive Vice President, Real Estate Industries
Jacqueline F. Bean	Senior Vice President
John M. Bell	Senior Vice President, Insurance and Risk Management Manager
Joseph J. Catalano	Senior Vice President, Associate General Counsel and Assistant Secretary
Nancy S. Crooks	Senior Vice President and Deputy Group Head, Independent Risk Monitoring Group – Credit
Theodore E. Davis	Senior Vice President and Assistant Secretary
David W. Dobon	Senior Vice President, Corporate Development

Frank W. Foley, Jr.	Senior Vice President and General Auditor
Lois Grace Golde	Senior Vice President, Financial Planning
David M. Hansen	Senior Vice President and Assistant Controller
Morris W. Hirsch	Senior Vice President, Deputy General Counsel and Assistant Secretary
Stephen L. Johnson	Senior Vice President and Director of Public Relations
Barbara J. Kosnar	Senior Vice President and Corporate Tax Manager
D. Jeffrey Morrow	Senior Vice President
William A. Polkinghorn	Senior Vice President, Deputy General Counsel and Assistant Secretary
Gabriel A. Renga	Senior Vice President and Senior Credit Officer
John A. Rice, Jr.	Senior Vice President, Investor Relations
Erin Selleck	Senior Vice President and Treasurer
Daniel B. Brigham	Vice President
Mary A. Helvey	Vice President and Assistant Secretary
Hugh Lawrence	Vice President and Assistant Secretary
Teryl Murabayashi	Vice President and Assistant Secretary
James M. Purvis	Vice President and Assistant Secretary
Brian W. Smith	Vice President
Michelle R. Crandall	Vice President, Investor Relations
Vicki J. Wilderman	Vice President and Assistant Corporate Secretary

February 14, 2007

By: /s/ Raymond L. Sweigart
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ATTORNEYS FOR
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CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of February 2007, a true and correct copy of the *Defendant UnionBanCal Corporation's Supplemental Objections And Responses To Plaintiff's First Set Of Interrogatories Regarding Jurisdictional Discovery To Defendant UnionBanCal Corporation* was forwarded electronically pursuant to the parties written agreement to the following counsel of record:

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/s/ Scott J. Pivnick
Scott J. Pivnick

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